EME COURT, U. S.

IN THE

Supreme Court of the United States

OCTOBER TERM, [redacted] 1970

No. [redacted] 271

RALPH L. WILLIAMS

v.

INTERNATIONAL TYPOGRAPHICAL UNION, AFL-CIO, and DENVER TYPOGRAPHICAL UNION, a Local Union of the International Typographical Union, AFL-CIO

OPPOSITION TO PETITION FOR A WRIT OF CERTIORARI

GERHARD P. VAN ARKEL, ESQUIRE
VAN ARKEL AND KAISER
1828 "L" Street, N.W.
Washington, D. C. 20036

JACK D. HENDERSON, ESQUIRE
ROBINSON AND HENDERSON
1710 First National Bank Bldg.
Denver, Colorado 80202

[redacted] of Byron S. Adams Printing, Inc., Washington, D. C.

IN THE

Supreme Court of the United States

OCTOBER TERM, 1969

No. 1703

RALPH L. WILLIAMS

v.

INTERNATIONAL TYPOGRAPHICAL UNION, AFL-CIO, and DENVER TYPOGRAPHICAL UNION, a Local Union of the International Typographical Union, AFL-CIO

OPPOSITION TO PETITION FOR A WRIT OF CERTIORARI

The International Typographical Union and Denver Typographical Union No. 49, the respondents and prevailing parties below, urge that the petition for a writ of certiorari herein be denied for the following reasons:

1. The petition does not claim that any question of public or national importance is involved. Nor could it. The only issues raised relate to the rate of dues which the petitioner is obligated to pay to, and his

rights within, the Unions. These are not issues of sufficient gravity to merit the attention of this Court.

2. The petition does not allege that there is any conflict among the Courts of Appeals, nor is there one. In a closely analogous case, relied on by the Court below, the Court of Appeals for the Second Circuit, reached the same result, *Cafero* v. *National Labor Relations Board,* 336 F.2d 115, affirming the like holding of the National Labor Relations Board, *New York Typographical Union Number Six,* 144 NLRB 1555 (1963).

3. The decisions of the courts below are clearly correct. Without here rearguing the case, those decisions (Appendices A One and Two to the Petition), show on their face that each of petitioner's contentions herein was carefully weighed and properly rejected for the reasons stated.

Wherefore the petition for a writ of certiorari should be denied.

Respectfully submitted,

GERHARD P. VAN ARKEL, ESQUIRE
VAN ARKEL AND KAISER
1828 "L" Street, N.W.
Washington, D. C. 20036

JACK D. HENDERSON, ESQUIRE
ROBINSON AND HENDERSON
1710 First National Bank Bldg.
Denver, Colorado 80202